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Attorney for Defendant:
The Kibel Companies LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

-----X **21 MC 102(AKH)**
STEVEN KEPLEY and SHIELA KEPLEY,

Plaintiff(s), **05CV4242 (AKH)**

-against-

THE CITY OF NEW YORK, et al.

NOTICE OF ADOPTION OF
ANSWER TO MASTER
COMPLAINT

Defendant(s).

-----X

PLEASE TAKE NOTICE that Defendant, **THE KIBEL COMPANIES LLC** (hereinafter referred to as "KIBEL") by it's attorney, Frank A. Scanga, Esq., as and for it's response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts it's Answer to the Master Complaint dated, filed and served July 31, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein.

PLEASE TAKE FURTHER NOTICE that defendant, KIBEL, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross-claim

against any and all co-defendants.

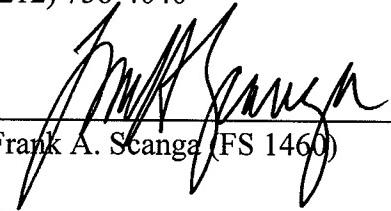
PLEASE TAKE FURTHER NOTICE that defendant, KIBEL, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, the defendant KIBEL demands judgment dismissing the above-captioned actions as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 18, 2007

FRANK A. SCANGA, ESQ.
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477 Madison Avenue
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By:


Frank A. Scanga (FS 1460)

To: Worby Groner Edelman & Napoli Bern
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the defendant, Kibel Companies LLC's Notice of Adoption of Answer and Defenses to Master Complaint was served this 19th day of September, 2007, via regular mail on the Plaintiff's Liaison Counsel (or other persons) whose names and addresses are set forth below, by enclosing a true copy thereof, in a securely sealed, postpaid wrapper, addressed to their respective addresses, and by depositing same in the official depository maintained by the U.S. Postal Service, at 477 Madison Avenue, 21st Floor, New York, New York 10022:

To: Worby Groner Edelman & Napoli Bern
115 Broadway, 12th Floor
New York, NY 10006

Robert A. Grochow, Esq.
233 Broadway, 5th Floor
New York, New York 10279

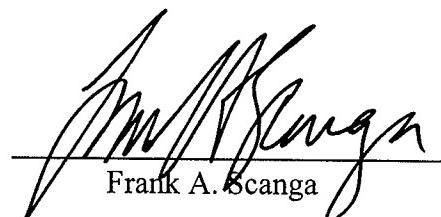
Gregory J. Cannata, Esq.
233 Broadway, 5th Floor
New York, New York 10279

and caused the documents to be electronically mailed via ECF to the following Defense Liaison Counsel:

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
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Thomas Egan, Esq.
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All Defense Counsel



Frank A. Scanga